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Illinois Environmental Protection Agency · P.O. Box 19276, Springfield, IL 62794-9276

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217/782-6761

Refer to: 1190400001 -- St. Clair Co.  
National Steel  
Granite City Division  
Compliance File

June 28, 1988

Fred Steinkuehler  
National Steel  
Granite City Division  
20th & State Sts.  
Granite City, Illinois 62040

Re: Pickle Liquor/Pfizer Pigments

Dear Mr. Steinkuehler:

In response to your letter of June 16, 1988, be advised that spent pickle liquor when used directly as a substitute for a raw material in the manufacture of a product is not a solid waste and, therefore, exempt from hazardous waste regulation, including manifesting, provided also that it is not speculatively accumulated, used in a manner constituting disposal or burned as a fuel.

Sincerely,

Eugene P. Theios, Manager  
Administrative Compliance Unit  
Compliance Section  
Division of Land Pollution Control

EPT:dh/7

cc: Division File ✓  
Pfizer Pigments



Fred H. Steinkuehler  
Director - Facility Services

Granite City Division  
National Steel Corporation  
20th & State Streets  
Granite City, Illinois 62040  
(618) 451-3281

June 16, 1988

Mr. Gene Theios  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62706

Dear Mr. Theios:

Please reference your telephone conversation of June 13, 1988 with our Mr. Carl Cannon regarding transportation and manifesting requirements of spent pickle liquor shipped to Pfizer Pigments, Inc. It is our understanding that as long as Pfizer is using this material as an effective substitute for a commercial product, the material would be exempt from regulation as a hazardous waste and manifesting would not be required. In the event this material is spilled in transit, it would become a hazardous waste but would not be in violation of IEPA regulations as long as the proper IDOT regulations were complied with. In the unlikely event Pfizer is unable to accept a shipment, the same set of paperwork used to ship the material could be used for return transportation.

We have requested verification in writing from Pfizer that this material will only be used as a substitute material in their process and not treated. In addition, we would appreciate your verification of the above information.

If you have any questions or require further information, please call Carl Cannon at 618-451-3013.

Very truly yours,

  
Fred Steinkuehler

LTR3.gwl:sc  
cc: Mr. Jeffrey C. Carlton, P.E.  
Safety/Environmental Engineer  
Pfizer Pigments, Inc.  
2001 Lynch Avenue  
East St. Louis, IL 62205

RECEIVED  
JUN 23 1988  
IEPA-DLEP

MAR 16 1987

WASTE MATERIAL DESCRIPTION

IEPA-DLPG

The Granite City Steel landfill is used only for the disposal of non-hazardous waste materials generated by the Company's operations and related construction activities. These waste materials consist primarily of dusts and sludges collected by air and water pollution control systems, and general construction/demolition/clean-up type waste materials. A more detailed breakdown of the waste materials by type is provided below:

<u>Waste Material Category</u>	<u>% Volume</u>
1) BOF Dust ( <i>Special Waste</i> )	35%
2) Blast Furnace Flue Dust ( <i>Special Waste</i> )	22%
3) Yard/Road Clean-up and Construction/Demolition Debris (furnace refractories, mixtures of dirt, slag and sand, railroad ties, building materials, etc.)	22%
4) General Refuse (paper, wood, metal, office and lunchroom wastes)	19%
5) Other dusts and sludges ( <i>Special Wastes</i> )	<u>2%</u>
TOTAL	100%

NOTE: These percentages were based on "typical" 4-month period of operation in 1986. Periodic cleanouts from the wastewater treatment system ditches and sludge dewatering facilities were not included in this tabulation.

The total volume of non-hazardous waste materials generated is estimated to be approximately 110,000 cubic yards per year.